# **APPENDIX C Transportation Plan**

#### C.1 INTRODUCTION

ENVIRON International Corporation (ENVIRON) has prepared a Presumptive Removal Action Workplan (RAW) to address volatile organic compounds (VOCs) in soil vapor at the Northwest Area of the Wyle Laboratories, Inc. Site, located at 1841 Hillside Avenue, in the City of Norco, California. The remedial action proposed in the Presumptive RAW includes *In Situ* Soil Vapor Extraction.

As part of the implementation of the Presumptive RAW, cuttings will be generated during SVE and vapor well drilling and trenching activities. This Transportation Plan is prepared to address excavated soil that will be generated as part of the implementation of the Presumptive RAW. All removal, transportation, and disposal activities will be performed in accordance with all applicable federal, state, local laws, regulations, and ordinances.

# C.2 WASTE CHARACTERIZATION AND QUANTITY

Soil sampling results from recent subsurface investigations in the areas of the proposed remediation activities generally did not contain VOCs above laboratory reporting limits. Therefore, the soil that will be generated from drilling activities is expected to be clean and will be disposed of as non-hazardous. The non-hazardous soil will be stored in onsite covered roll-off bins or 55-gallon Department of Transportation (DOT)-approved containers awaiting disposal.

During field activities, ENVIRON personnel will monitor the excavated soil for organic vapor by a photoionization detector (PID) and observe for odors or staining. If elevated PID readings occur in certain areas of the Site and/or the soil appears discolored, then the soil will be segregated and profiled accordingly. In addition, ENVIRON will monitor and take appropriate control measures to minimize fugitive dust that may generate from any field activities. Such control measures will follow the South Coast Air Quality Management control (SCAQMD) Rule 403 for Fugitive Dust.

Based on the ground water contamination, VOCs expected in soil would be primarily trichloroethene (TCE), as well as tetrachloroethene (PCE) and its degradation byproducts (*cis*-1,2-dichloroethene [*cis*-1,2-DCE], *trans*-1,2-dichloroethene [*trans*-1,2-DCE],). The contaminated soil will be separated from the non-contaminated soil and will be stored in separate roll-off bins or drums.

#### C.2.1 Waste Profile

The waste material will be profiled, results submitted to the disposal facility, and once approval from the disposal facility is obtained, the excavated soil will be transported to the disposal facility. Additional documentation will be provided to the California Environmental Protection Agency – Department of Toxic Substances Control (DTSC) pertaining to waste disposal profiles and waste disposal acceptance prior to any off-site shipments of waste.

## C.2.2 Hazardous Waste Management

If excavated soil is found to contain measurable amounts of organic vapors, it will be treated as a Resource Conservation and Recovery Act (RCRA) Hazardous Waste and disposed of at a California Class I hazardous waste landfill, or at an out-of-state facility that has specific permits to accept these wastes. While remaining in California, all hazardous wastes will be properly managed, manifested, and transported by a registered hazardous waste hauler to a hazardous waste management facility in California.

However, based on the analytical results of the most recent investigations, the excavated soil from the Site is not expected to be classified as hazardous, thus it will be handled, transported, and disposed of as non-hazardous waste, unless otherwise directed or approved by DTSC.

## C.3 SOIL STAGING OPERATIONS

Excavated soil will be temporarily stored in covered roll-off bins or in 55-gallon DOT- approved containers on-site until off-site transportation and disposal is arranged.

## C.4 REQUIREMENTS OF TRANSPORTERS

Wyle Laboratories will hire qualified transporters for hauling the excavated soil off-site. The selected transporters will be fully licensed and insured to transport the excavated soils. For transportation of hazardous wastes, the selected transporter will be a registered hazardous waste hauler.

## C.5 TRAFFIC CONTROL PROCEDURES

Soil for off-site disposal will be transported in covered roll-off bins to the designated disposal facility. Prior to loading, all trucks will be staged on-site to avoid impacts on the local streets. Traffic will be coordinated in such a manner that, at any given time, no more than three trucks will be at the Site, to reduce truck traffic on surrounding surface streets and reduce dust generation during on-site transportation. While at the Site, all vehicles will be required to maintain slow speeds (i.e., less than five miles per hour) for safety purposes and for dust control measures.

#### C.6 TRUCK LOADING OPERATIONS

Trucks will be loaded on the designated portion of the soil staging area. Roll-off bins or 55-gallon containers will be loaded onto trucks, for transportation to the designated disposal facility. By loading at the staging area, the transport trucks will not have to drive on contaminated soil, thereby avoiding the creation of dust in the air or dirt on the truck tires. All vehicles will be decontaminated prior to leaving the work area. All stray waste material on vehicles, the tires, or the lip of the roll-off bin, etc., will be cleaned off manually. Then the roll-off bin portion of the truck will be covered to prevent soil and/or dust from spilling out of the truck during transport to the disposal facility. Prior to leaving the load-out area, each truck will be inspected by ENVIRON personnel or the Site supervisor to ensure that the bins/containers are adequately covered or secured, the trucks are cleaned of overburdened soil, and the shipment is properly manifested. Each truck will receive the

proper placarding and paper work. Water spray or mist, as appropriate, will be applied during soil loading operations.

#### C.7 SHIPMENT DOCUMENTATION

## **Hazardous Waste Shipment**

When the excavated soil is profiled as a hazardous waste, the Uniform Hazardous Waste Manifest form will be used to track the movement of hazardous waste soils from the point of generation to the point of ultimate disposition. Prior to transporting the excavated soil offsite, an authorized Wyle representative will sign each hazardous waste manifest. The hazardous waste hauler will then sign the manifest and distribute one signed copy to the removal action contractor's Site manager. ENVIRON will maintain a copy of the hazardous waste manifest for each truckload on-site until completion of the RAW. At a minimum, the shipping document will include the following information:

- Name and Address of Waste Generator
- Name and Address of Waste Transporter
- Name and Address of Disposal Facility
- Description of the Waste
- Quantity of Waste Shipped

## **Non-hazardous Waste Shipment**

When the excavated soil is profiled as non-hazardous waste, a proper shipping document (such as bill of landing or invoice) of the hauler will be used to document and accompany each truck shipment. At a minimum, the shipping document will include the following information:

- Name and Address of Waste Generator
- Name and Address of Waste Transporter
- Name and Address of Disposal Facility
- Description of the Waste
- Quantity of Waste Shipped

ENVIRON will maintain a copy of the shipping document for each truckload on-site until completion of the removal action.

## C.8 TRANSPORTATION ROUTES

Transportation of contaminated soils will be on arterial streets and/or freeways, approved for truck traffic, to minimize any potential impact on the local neighborhood. In general, the transport trucks will exit the Site north on Hillside Avenue, and travel west through Second Street toward the Ontario Freeway (I -15), see Figure C-1. For activities beyond Site boundaries, transport trucks will proceed west through Third Street then south on Temescal Avenue where they will proceed along the main route along Second Street toward the Ontario Freeway. There are numerous alternate routes that can be taken to the designated facility.

## C.9 OFF-SITE LAND DISPOSAL FACILITIES

Based on the results of waste profile and classification, the excavated soil will be transported to a proper off-site land disposal facility.

## C.9.1 RCRA Hazardous Waste

All RCRA hazardous wastes will be disposed of at a Class I Hazardous Waste disposal facility specified below or equivalent:

Chemical Waste Management 35251 Old Skyline Road Kettleman, California 93239 Phone: (559) 338-9811

#### **C.9.2** Non-Hazardous Waste:

Non-hazardous soils are planned to be transported to a Class III Landfill or to a thermal desorber landfill, as specified below:

American Remedial Technologies 2680 Seminole Avenue Lynwood, California 90282 Phone: (213) 357-1900

Final determination of the landfill selected for disposal will be based on approval from the landfill. Once the landfill is determined, copies of waste profile reports used to secure disposal permission from the landfill will be provided to DTSC. Compliance with the land disposal restrictions and land ban requirements for RCRA hazardous wastes, as necessary, will be documented and provided to DTSC once it is determined which disposal facility will be used.

#### C.10 RECORDKEEPING

ENVIRON will be responsible for maintaining a field logbook during the removal action activities. The field logbook will serve to document observations, personnel on-site, truck arrival and departure times, and other vital project information.

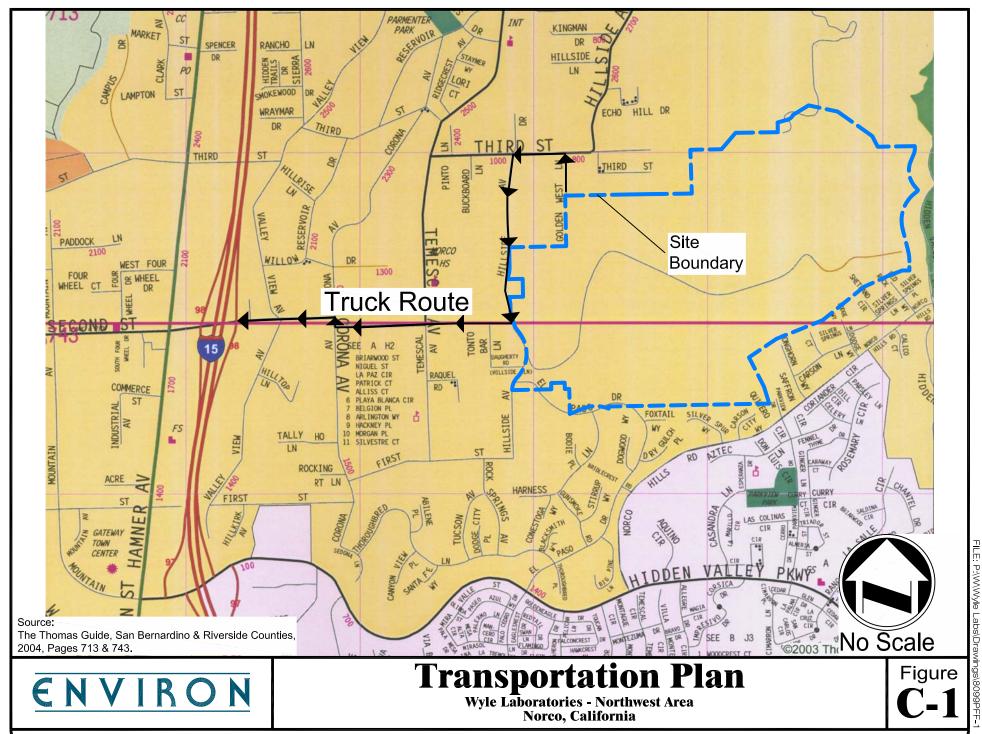
#### C.11 HEALTH AND SAFETY

A site-specific health and safety plan (HASP) has been prepared and included as Appendix B of the RAW. All personnel working at the Site will be required to be familiar with the HASP.

# C.12 CONTINGENCY PLAN

Each waste hauler is required to have a contingency plan prepared for emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of excavated soils from the Site to the destined disposal facility. Once the waste hauler is selected, a copy of its contingency plan will be attached to this Transportation Plan.

 $P: \\ W \\ Value Labs \\ Norco \\ Presumptive RAW \\ Appendices \\ Appendix C \\ NWA-RAW \ Transportation \ Plan. doc$ 



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Drafter: JJC

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